

## **REMARKS**

Claims 1-26 are currently pending in the application. Claims 1 and 18 are in independent form. The *Office Action* was received and reviewed. In this *Response*, the Applicant provides the following remarks.

### ***Rejection Of Claims 25 And 26 Under 35 U.S.C. 112***

At sections 2 and 3 of the *Office Action*, claims 25 and 26 were rejected under 35 U.S.C. § 112 as lacking proper antecedent basis for the phrase “the sets”. Applicant disagrees. Claim 25 and claim 26 each depend from claim 24. Claim 24 uses the phrase “the sets”.

Claim 24 depends from claim 18. Claim 18 recites two sets, a “first set” and a “second set”. Hence, antecedent basis for “the sets” is present. As such, the rejection under 35 U.S.C. 112 must be withdrawn. It is requested that the rejection under 35 U.S.C. 112 be withdrawn.

### ***Claim Rejections - 35 U.S.C. 102***

At section 4 of the *Office Action*, claims 1-26 were rejected under 35 U.S.C. § 102(b) as being anticipated by a European patent application (“Williams”), which was published as Pub. No. EP 1 031,913 A2. Williams is directed to a communication terminal having a predictive editor application. It is respectfully submitted that Williams does not disclose the features of the claims for at least the following three reasons.

**First Reason:** Claim 1 of the instant application requires, among other features, “a data-type software module which includes executable instructions to identify types of data that might be returned to the user” and the cited sections of Williams do not disclose this feature. In the *Office Action*, it was argued that this feature is disclosed at paragraph 19 of Williams. At paragraph 19, Williams discloses the use of a selection list, which lists various interpretations and options corresponding to the output of the predictive editor. The selection list of Williams does not identify types of data that might be returned to the user. As used in the claims, the word “types” is used to mean qualities common to a number of individuals that distinguish them as an

identifiable class. The selection list of Williams does not identify *types* of data - instead, Williams identifies the data themselves. Such a system is likely to produce a long list data, which the user is then required to review. Such a process is at best tedious, and more likely frustrating to the user. Since Williams does not identify types of data, Williams does not disclose this required feature of claim 1.

**Second Reason:** Claim 1 requires “a service-descriptor software module which includes executable instructions to identify valid actions corresponding to each identified type of data.” The Examiner identifies feature 42 of figure 3 as disclosing this feature. Feature 42 is the ‘disambiguation software’ of Williams, the operation of which is described in paragraphs 20-23 of Williams. Williams’ disambiguation software merely identifies data (such as a word from a dictionary or a phone number from a phone list) that matches the keypresses on the keyboard. The cited portions of Williams do not describe using a data type to identify valid actions, as required by claim 1 of the current application. Since Williams does not identify valid actions corresponding to identified types of data, Williams does not disclose this required feature of claim 1.

**Third Reason:** Claim 1 requires an information-search software module which includes executable instructions to identify a set of information corresponding to one of the identified valid actions. In the *Office Action*, Williams’ process steps 100 and 103 of figure 11 are cited as disclosing this requirement. Figure 11 describes the “basic editing concept” of the predictive editor. See Williams at paragraph 76. Here, Williams discloses that in response to a user pressing a key, the system will identify that the user has pressed a particular key, and then appropriate an alphanumeric character or system designated control function (e.g. send) that corresponds to that key press. Such an effort is not associated with identification of information corresponding to one of the identified valid actions, as required by claim 1. Therefore, Williams does not disclose this required feature of claim 1.

**Concluding Comments:** Even if one argues that pressing a key using the Williams system is a valid action, that action has not been identified using an identified data type.

Identifying a data type is a required feature of the claims of the current application. Williams does not disclose this feature of claim 1.

Because every feature of claim 1 is not disclosed in Williams, Williams does not anticipate claim 1. As such, the 35 U.S.C. 102(b) rejection must be withdrawn. Applicant respectfully requests the removal of the rejection of claim 1.

Claims 2-17 depend from claim 1, and therefore include all the features of claim 1. Consequently, claims 2-17 are allowable for at least the reasons described above. Therefore, removal of the 35 U.S.C. 102(b) rejection of claims 2-17 is respectfully requested.

Claim 18 is directed to a method. The method is similar to the system of claim 1. The similarities between claim 1 and claim 18 are such that the arguments outlined above in support of claim 1 are also applicable to claim 18. Thus, claim 18 is allowable, and Applicant respectfully requests removal of the rejection of claim 18.

Claims 19 through 26 depend from claim 18, and therefore include all the features of claim 18. Consequently, claims 19-26 are allowable for at least the reasons described above. Therefore, removal of the 35 U.S.C. 102(b) rejection of claims 19-26 is respectfully requested.

### ***Conclusion***

In view of the foregoing remarks, it is respectfully submitted a full and complete response has been made. The claims are in condition for allowance, and allowance of the claims is respectfully requested.

The Applicant believes that a one-month extension-of-time is needed in order to enter this *Response*. A petition for a one-month extension accompanies this *Response*. If additional time is needed, please consider this to be a petition for an extension-of-time sufficient to enter this *Response*. The fee for the extension-of-time should be charged to Deposit Account No. 08-2442.

The Examiner is invited to call Applicant's attorney if any questions remain following review of this *Response*. If it will help, the undersigned is willing to explain by telephone or in person, the reasons the claims are allowable.

Respectfully submitted,

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